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## **MEMORANDUM**

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**To:** Laura Ripley, U.S. EPA RPM

**From:** Jeff Groen, Project Hydrogeologist

**Date:** January 7, 1994

**Subject:** Wisconsin Steel Works Site  
Phone conversation record with Tracy Fitzgerald (IEPA) on November 23, 1993  
(Project #04015.23)

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This morning I discussed the Wisconsin Steel Works site (WSW) with Mr. Tracy Fitzgerald of the Illinois Environmental Protection Agency (IEPA) for approximately 40 minutes. Mr. Dick Leonard of the USACE from Buffalo, New York, had received the U.S. EPA comments regarding the Site Characterization Interim Report (completed about a month ago), and Mr. Leonard had some questions for the IEPA.

Our comments included recommendations to characterize site-specific geologic stratigraphy and determine the possible existence of contamination beneath the confining till unit. However, the IEPA had strongly discouraged the Corps from "making Swiss cheese" of the site by doing all of the initial investigative work within and above the Wadsworth Till (i.e. no borings or monitoring wells were to be completed beneath the confining till unit). Mr. Fitzgerald indicated that a "cat in a sandbox" can't do much damage, and an investigation of geologic units beneath the till may now be proposed because we have some understanding of the site's hotspots. In general, I concurred with Mr. Fitzgerald's comment, and we agreed that deeper site-specific investigations are now appropriate.

I also suggested that continued characterization of the till as an aquifer be abandoned, and, instead, the till be recognized as an aquitard. Mr. Fitzgerald agreed and indicated that he had never before seen such a till unit investigated as an aquifer. I also asked about the monitoring well screen depths, and I suggested that the existence of LNAPLs (and DNAPLs) required additional investigation. Mr. Fitzgerald agreed.

Finally, Mr. Fitzgerald indicated that he would call USACE soon and request that they put together some recommendations for additional investigative work. This work may include characterization of deeper geologic units provided safeguards are included, such as sealing the

deep borings via double-casing into the till. Each of the recommendations must be clearly justified and the methods of investigation adequately documented. After submitting the recommendations, Mr. Fitzgerald suggested that the IEPA and the U.S. EPA work cooperatively in their response to the USACE before approving the additional investigations.

I encouraged Mr. Fitzgerald to contact Ms. Laura Ripley, the U.S. EPA's Project Manager, and my supervisor, Mr. Theodore Lietzke, regarding a united response to the USACE. Mr. Fitzgerald acknowledged his responsibility to contact the U.S. EPA, but he indicated that he had wanted to contact me regarding the above technical issues before responding to Mr. Leonard's questions.

cc: Theodore Lietzke  
Liz Bartz  
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## **MEMORANDUM**

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**Date:** January 7, 1994  
**To:** Laura Ripley, U.S. EPA, RPM  
**From:** Theodore A. Lietzke, WWES, SPM  
**Re:** Wisconsin Steel Works Site  
Initial Site Visit on September 21, 1993  
Project # 04015.23

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Three staff professionals from WWES (Ted Lietzke, Liz Bartz, and Jeff Groen) visited the Wisconsin Steel Works site (WSW) during the morning of September 21, 1993. They were given an escorted 1/2 hour "windshield" tour of the site, which is located approximately seven miles south-southwest of downtown Chicago along the west bank of the Calumet River. A formal presentation of the site was given after the site visit. Also participating in the visit were Ken Tindall and Laura Ripley of the U.S. Environmental Protection Agency (U.S. EPA), Region 5, as well as representatives of the U.S. Department of Justice (DOC), The U.S. Department of Commerce (DOC), the U.S. Army Corps of Engineering (USACE) and the Illinois Environmental Protection Agency (IEPA). A list of the participants is attached to this memo. The remainder of this memo will be divided into two parts: a description of WSW based on the windshield tour and a summary of the subsequent technical and status meeting.

### **WINDSHIELD TOUR OF THE WSW SITE**

An escorted windshield tour of the WSW site began shortly after a 9:00 a.m. rendezvous at the front gate (see the attached diagram for reference); Mr. Dick Leonard of the USACE from Buffalo, New York, led the tour. The site is currently divided into six areas, which are located on three separate land parcels: Areas I-IV (approximately 150 acres) include the original steel production, storage, and finishing facilities; Area V (approximately 5 acres) includes the original administrative building and some parking; and Area VI (approximately 26 acres) which includes a large slag pile and no buildings. Only a few buildings remain of the original facility; most of the original structures have been demolished. The structures observed during the tour included the continuous caster wall in Area I, the No. 6 Merchant Mill, the truck warehouse and the guard shack in Area IV, and the administrative office building in Area V.

Rubble and demolition debris covered most of the site's surface, and robust weeds standing as high as 3-4 feet, were growing between the rubble. Several of the site's 23 monitoring wells were observed during the tour; other RI-related objects or activities included hazard fencing, truss-type roofing above contaminated material (the roofing was painted with graffiti, indicating that trespassing does occur despite the site fence), and Rapid-Response ACM-removal activities related to the No. 6 Merchant Mill. We also observed several concrete pits, approximately 5-feet wide by 15-feet long, which were filled with dark liquid. (Apparently, over 100 pits and foundations exist on the site.)

Based on Mr. Leonard's narrative, the adjacent Calumet River is dredged yearly to a depth of approximately 25 feet. Both the North Slip and the South Slip were apparently also dredged to a depth of approximately 22 feet, but have been largely abandoned in recent years, except for use of the South Slip by the south-adjointing property tenant. The "Old" North Slip, previously existing northeast of the current North Slip, has apparently been partially graded but was not observed during the tour.

East of the WSW site and across the river is an operating steel facility (formerly Republic Steel). The area surrounding the site to the northeast, east, and south along the Calumet River is primarily heavy industrial and manufacturing; however, north and west of the site are commercial and low-income residential zones.

Several land parcels have been sold since the EDA's involvement over ten years ago. One such parcel included three mill buildings northwest of Areas I-IV across the railroad tracks. These buildings appeared to be in poor condition, as were the few buildings on-site.

Leonard indicated during the tour that the local stratigraphy included approximately 10 feet of fill, 15 feet of sand (in which the water table exists), and an additional 30 to 50 feet of a dense, low-permeable poorly-sorted clay and gravel known as the Wadsworth Till. Beneath the till at a depth of 50 to 70 feet is bedrock.

As we drove by Area V, we observed that the area was fenced and the area's single building, once used as administrative offices, was boarded-up. Area VI, located on a separate parcel north of the previous areas, included a very large slag (calcium-silicate) pile. A 4-foot berm of slag surrounded the approximately 26-acre area, except for a small access point along 100th Street, bordering Area VI to the north. 100th Street was apparently being re-paved. Residences existed

east, north and west of the slag area. The windshield tour was concluded by approximately 10:00 a.m.

### SUMMARY OF WSW QUARTERLY BRIEFING

Apparently the quarterly technical and status meetings are normally held in Washington, DC. However, due to the site tour and the invited presence of the IEPA and the U.S. EPA, the quarterly meeting was held in South Chicago at the South Chicago Savings Bank. The meeting's agenda is included in this memo's attachments.

Sam Nakib, representing Chicago's regional USACE, provided some introductory comments and described the various agency involvements. Michael Oberlitner described the role of the Economic Development Agency (EDA, a branch of the DOC). Mr. Oberlitner has been pursuing site redevelopment and interagency cooperation for over ten years. Initially, his focus was on demolition activities, but contaminant investigation and remediation activities have since become the key issues to site redevelopment.

Lieutenant Colonel Boruch, representing the USACE in Washington, DC. described the Corp's joint efforts with the DOC. LTC Boruch indicated that the primary project management responsibilities were held by the USACE office in Buffalo, New York, and the Omaha USACE office served as the primary technical resource. LTC Boruch mentioned that their commitment to developing public relations with the local community, and, to that end, he indicated that an 800 number was available and listed on the site to provide the public with easy-access information. (The phone number, 1-800-833-6390, is indeed functional as WWES employee, Jeff Groen, spent over an hour discussing several of the site's technical issues with knowledgeable people at the Buffalo USACE office.)

Dick Leonard, the tour guide and the ACE manager for WSW's site assessment and monitoring program from the Buffalo office, presented the technical briefing. Mr. Leonard indicated that a "Rapid Response" program had been successfully implemented during 1991-1992 to address immediate environmental concerns at the site. Some of these rapid response actions included: fencing around on-site hazards, removal of existing above-ground gas holders, solidification and removal of coal tar material, spraying of some soil sealant to prevent contaminant volatilization, construction of a slag berm to reduce access or dumping near the slag pile, and asbestos abatement in the No. 6 Merchant Mill. Mr. Leonard also indicated that the following activities are being considered for the future: remediation of pits and foundations, removal of 4 existing USTs,

installation of slurry walls to prevent contaminated ground water beneath Area II from entering the slips and the Calumet River, additional subsurface investigations, completion of risk assessments, sediment sampling of the slips and the Calumet River, and an investigation of the site's underground tunnels, and ducts, and storm sewer outfalls.

George Brooks, also from the Buffalo USACE office, discussed the site's current schedule and its status with regard to USACE data management, real estate assignments, and its possible NPL ranking. Mr. Brooks stated the Phase II work is scheduled for the spring of 1994, and a response from the U.S. EPA and IEPA regarding the recently completed "Site Characterization Interim Report" should be submitted to the USACE during October, 1993. (It is worth noting that Tracey Fitzgerald, IEPA's current project manager for this site, will be replaced by Eric Runkel within approximately two months.)

Ken Tindall indicated that the U.S. EPA will provide fact sheets and technical support, but their involvement will not expand beyond such technical support until the site is NPL-listed.

A Federal Facilities Agreement is in the process of being drafted between U.S. EPA and the EDA. The EDA is hopeful that the U.S. EPA will sign/execute that agreement by early December. Another technical and status meeting was suggested for January, 1994.

The above technical and status meeting was concluded at approximately 12:00 noon.

cc: Jeff Groen, WWES, Minneapolis  
Liz Bartz, WWES  
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WSEN Mtg 9/22

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# Main Wisconsin Steel Trust Property

